



EUROMETAUX CHEMICALS MANAGEMENT NEWS



We wish all our readers a healthy, better, happy and fulfilling
New Year 2022.

We thank you all for your trust, your collaboration and your faithful
reading of our Newsletter.

We send you all our best wishes and look forward to seeing you soon

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Dear All,

He stood up in front of the projected slides and started talking. Time seemed to be on hold for a moment. Just enough to experience some disbelief and formulate the question: “really, will he do this?” Then a couple of seconds elapsed while I wondered “should I say or do something?”

I admonished myself as I was losing the thread of the speech and most probably some of the ideas expressed by the speaker. “Focus”, I said to myself! “Go for the substance! Try and catch the details to prepare yourself for a constructive intervention!”

And then “Oh boy, do not look at the other participants’ raised eyebrows”.

I have learnt that a good and convincing speech is built on content, structure but also on the way it is brought up, targeting its addressees correctly. “Your attitude towards the audience, even before the subject, will convince (or not)” was the “mantra” constantly repeated at university, building on the hypothesis that knowledge of the public’s characteristics is the first step to take before sharing intelligence.

That’s because the audience, i.e., you and me, don’t see things as they are; we see things as we are (Anais Nin).

A speech is interactive work: both the speaker and the audience need to make a move. Hence, I could not agree more with the approach proposed by a Chinese philosopher a long time ago (and freely translated here): ‘All the art of oratory can be summed up in this formula: we welcome the listener with seriousness, we retain him by sincerity, we maintain him by rigour, we instruct him by distinctions, we enlighten him with comparisons, and we move towards him with a sweet fragrance of amenity (Xun Zi)’.

Could I reconcile what I saw in front of me with the qualities mentioned by Xun Zi? Maybe not in a ‘traditional way’. However, I had to admit that with the flow of the presentation, my brain had pushed aside the sense of incongruity it had first noticed and was now closely following the presenter’s reasoning, trying to identify possible convolutions and commentaries to provide. I was caught by the lecture, and close to being convinced. The -creative- deviation from the principles of a good speech did not hamper the message. Because of the amenity that was still present in the speaker’s tone, but also his passion and the joy in his tone.

And that’s probably the wish for 2022 I have for us all. Let’s keep our appetite, enthusiasm and creativity alive in what we do, to avoid discouragement.

And who knows: you may also -end of the year- hear Father Christmas explaining the future of risk management?



Violaine Verougstraete

COMMISSION

CARACAL CLP Revision: *targeted surveys and dedicated CARACAL meetings*

December was a busy month for chemicals policy, and that was especially the case for the revision of the Classification Labelling and Packaging (CLP) Regulation. The consultants in charge of supporting the Commission to draft their impact assessment of the revision have organised a so-called Targeted Stakeholder Survey (TSS), while the Commission organised two ad-hoc CARACAL meetings on 6 and 14 December. Eurometaux responded to the TSS, attended the two CARACAL meetings, and provided written input to CARACAL documents afterwards. Among the many issues raised were, of course, the new hazard classes, but also the harmonisation of safety values, the Commission's mandate to propose harmonised classifications, how to improve the C&L inventory and self-classification, and many more issues...Thanks a lot to all who provided us with input and reviewed our drafts. For more details regarding our contributions, please contact Violaine Verougstraete, Lorenzo Zullo, or Noam El Mrabet.

EU AGENCIES

EUROPEAN CHEMICALS AGENCY (ECHA)

ECHA COMMITTEES

MSC-76: *launch of CoRAP review and start of discussion on 11th priority list with Pb metal being potentially proposed*

Besides the usual MSC agenda items on Dossier and Substance Evaluation, MSC started the discussion on the CoRAP update 2022-2024 (Substance Evaluation rolling list) and launched its activity for the identification of the 11th priority list for Authorisation.

This time, the proposed update for the CoRAP came as a big surprise in that they postponed the evaluation year for 20 substances, withdrew 25 and added only 2 substances to the list. The reshuffling will result in only 2 substances being listed for 2022 Substance Evaluation (new emergencies to assess Substances of Very High Concern (SVHC) properties), far from the initial aim of 25 substances/year. The withdrawals - including CeO₂ for nano concerns- were justified by registration dossier updates that removed the risk concern, or by an ongoing dossier evaluation expected to clarify the concern(s), or by the evaluating Member State not being able to guarantee a review before 2025. Industry welcomed the clarity on what cannot be done in a reasonable period of time, while NGOs criticised the withdrawals, stating that the process was too slow and inefficient. ECHA intends to publish the CoRAP update on 22 March 2022.

MSC also reviewed the first ECHA proposals for the 11th priority list based on the priority scoring table. ECHA reviewed all substances on the Candidate List, reviewed the scoring based on the most recent registration information on volume/uses and suggested to propose all substances above a defined scoring to be selected for the list. Lead metal would meet the criteria while cadmium and its compounds would not, so there is a very high probability that MSC will recommend lead metal being on the 11th list. The proposed list will be published for Public Consultation early February, allowing industry and others to react for 6 months on why the substances should or should not be selected. MSC would continue its review activity in Q4 2022 to conclude on the 11th list during its February 2023 meeting. Given its importance and impact, Eurometaux and ILA are following this activity very closely and will organise a specific briefing session on 28 January (see Calendar) (more information: Hugo Waeterschoot).

MSC-76: *interesting court and Board of Appeal learning cases presented*

The court case T-661-19 challenged the Substances of Very High Concern (SVHC) identification of a substance for Endocrine Disrupting (ED) properties based on a fish test result of limited quality, asking to apply a weight of evidence (WoE) approach, making a plea for more proportionality, and requesting a substance evaluation to be conducted before risk management is applied. The judgement was remarkable in that it confirmed that ECHA must follow the principle of scientific excellence and current scientific standards, but that this does not include an obligation to apply a formal WoE (i.e., authorities can use different methodologies for establishing the hazard: they do not need to use a formal WOE), nor was there a breach of the proportionality principle.

The BoA cases (A-006/7-2020 and A-009-2020) related to comparable issues. One annulled the request by ECHA for Annex IX information given the registrant declared a tonnage downgrade after he received the draft decision. This annulment will require a review of ECHA's policy on not accepting any downgrades from the moment they open a Compliance Check! The outcome of the second case was very different in that ECHA was right to conclude on non-compliance in a case whereby the company did not follow up on a final decision given production was halted (due to a fire). The BoA conclusion means that the appellant remains bound to the legal provision to provide the information reported in the registration dossier.

All these cases are most relevant for the metals consortia so will be included in the agendas of the next Evaluation and Risk management Taskforce meetings (more information: Hugo Waeterschoot).

MB-64: the 2022-2025 Programming Document for ECHA approved

The last Management Board (MB) meeting of the year focussed on the approval of the budgets and workplans for the next 3 years (2022-2025). One main suggestion that was included (submitted by industry but contested by the NGO representative) was the request to broaden the spectrum of ECHA's activities (especially on risk management) towards the 3 Cs (Chemicals, Climate and Circularity).

The earlier tensions between the ECHA MB and the Commission on the expected input of (extensive) ECHA resources for Commission's CSS activities was resolved in that ECHA is now including this input as a regular activity, hence included in the assessment of human and financial resources. On the other hand, it does mean that we will lose the separate reporting on ECHA's CSS activities which has so far demonstrated to be a helpful tool in assessing what was ongoing on the CSS, ECHA's work and the involved timelines. Industry requested to maintain this, but it seems unlikely that ECHA will do so.

On the financial side, it looks like 2021 was a bit better than expected due to remaining (relative) high income on registration fees which inspired industry to request to use this for the ECHA support activities to industry (helpdesk, supply chain communication, ...) as those had been suspended previously for budget reasons.

Some additional points of interest are that ECHA and Commission seem to be progressing with the alternative fee system to cover for the eroding registration and authorisation fee incomes. A proposal is expected by the end of Q1 2022.

The selection process for the new Executive Director to replace Björn is running but there is no news yet on the potential candidates. Finally, ECHA seems to be working on examples of Essential Uses following a request from the Commission, but there will be no further news about this until the workshop scheduled on this theme later in Q1 2022 (more information: Hugo Waeterschoot).

EUROMETAUX CHEMICALS MANAGEMENT

Chemicals Management Steering Committee: last 2021 meeting

The last meeting of 2021 began with a debrief of the 7 December event: "Green Deal Metals in Europe: Tackling the Zero Pollution Challenge". The main consensus points stemming from this debate were that the Zero Pollution (ZP) challenge is coming and needs to be addressed by all collectively, with scientific credibility backed with data as an important mean to support our arguments.

It was also noted that there are growing tensions between risk-based vs. hazard-based approaches, for example in the Chemicals Strategy for Sustainability (CSS) debates and that a risk-based approach should remain the target.

The importance of re-creating trust, further engaging in education and communication on metal specificities were noted as was the necessity to maintain interactions with our main customers and other sectors. It was concluded that there is a need to achieve a practical and workable regulation, that we need to demonstrate that metals are part of the solution (notably regarding the circularity objectives) and go for collective strategies to address this global challenge, explain metals interdependencies, and keep a balance between short vs. long-term actions and local vs. global measures. Further steps were discussed.

To follow there were updates given on the high-level messaging on the 3Cs, the Sustainability concept and the metals stock, which will be pursued with a small team who will get together to elaborate communication visuals; the Zero Pollution Action Plan (ZPAP) and EM's strategy and project proposal on Air Quality (Directive) following the release of the new WHO guidelines and fitness-check in the Green Deal (GD) context.

The participants were also briefed on the REACH Revision timeline and the relevant studies that are in progress or will start in 2022 as well as on ongoing actions/reflexions on the future of Risk Management. A status update on the Mixture Assessment Factor (MAF), EM's pilot study/strategy and a review of Commission's Workshop held in November were provided and the meeting concluded by evoking the workplan for 2022, which will undoubtedly be a busy year, requiring coordinated actions between the Taskforces and the different EM Committees. The draft minutes were circulated on 23 December 2021 (more information: Violaine Verougstraete).

Human Health Taskforce Meeting: *last 2021 updates*

The last 2021 call focused on a series of updates, starting with bioelution. The Taskforce was informed on the most recent developments at OECD level (i.e., the Test Guideline) and at CARACAL level (i.e., the discussion on how to possibly use bioelution results to refine the alloys classification). On the latter, a lot of work has been done in Q3, with Eurometaux submitting a series of documents for discussion at the CASG Bio, namely a possible decision tree on how to assess available information and refine the classification of alloys for the oral route of exposure, documents on the selection of a representative sample and a possible approach to group alloys. Eurofer shared a Safety Information Sheet that accompanies stainless steel articles to demonstrate that even though CLP classification is not needed for 'articles', information about the material's composition is communicated.

To note, CARACAL extended the CASG Bio mandate by 6 months, which will give the opportunity to hold further discussions. The use of bioaccessibility in grouping and read-across was also evoked, as a revision of the OECD Guidance on Grouping Chemicals has been launched. The sector will contribute to this revision but in the meantime it was suggested to ensure the justifications for grouping are robust and to publish where possible how grouping was done in the literature.

Secondly, Occupational Safety Health (OSH) and the recent developments on Occupational Exposure Limits (OELs) were explained with very useful updates on the Ni, Co and Pb OELs. Some information was provided on ongoing work on dermal exposure and other publications of interest.

Were then discussed briefly: the outcome of the Mixture Assessment Factor (MAF) Commission Workshop (with a focus on human health); an update on recent, ongoing and future repro studies with metals for which a sub-group will be created; mutagenicity and work on criteria at UN GHS level; a status update on the discussions in the MSC on a proposal to phase out the *in vitro* and *in vivo* Chromosome Aberration test under REACH Evaluation. The latter will be discussed further by the Evaluation Taskforce after the February MSC meeting.

Finally, some slides were shared with a status update on HBM4EU, the 2022 ARA workshop, the upcoming IARC meetings and an update of the T25 issue. The draft minutes were circulated on 15 December 2021 (more information: Adriana Oller, Ruth Danzeisen, Daniel Vetter and Violaine Verougstraete).

CHEMICALS STRATEGY FOR SUSTAINABILITY

Chemicals Strategy for Sustainability Project Group meeting: *20 December*

The group had its final meeting of the year to summarise progress for 2021, get up to date on developments since the October meeting, and look ahead to the key challenges for the first part of 2022. The main development since the previous meeting was the 2nd High Level Roundtable (HLRT) which took place in late November. As preparation for that meeting, Eurometaux outlined its many activities in support of a smooth implementation of the CSS - proactive and reactive - in a written "ambassador report" that was published on the HLRT website and summarised verbally in the HLRT meeting by Guy Thiran. The group reviewed and discussed the output from the meeting, which was in the form of several reports and presentations on enforcement activities illustrating the scale of the challenge with respect to non-compliances (particularly with online sales) - including the HLRT "joint report" and its 10 recommendations. The Eurometaux position is broadly in line with these recommendations, with some caveats relating to specifics - for example the difference between "naming and shaming" of companies that repeatedly offend, and a "whistle blowing system" for use by stakeholders who wish to report non-compliances to the regulators so that they may be dealt with promptly. The former is intended to be public whereas the latter is not. The group also discussed the importance of enforceability of (current and) future legislation, acknowledging that there was significant disagreement on this issue whilst drafting the HLRT joint report - which was not captured in the report nor in the recommendations. The next step on the joint report is for a breakout group of Sherpas to be formed to take the 10 recommendations forward in a measurable way.

With respect to challenges for 2022, some elements of the Commission’s work on CSS are delayed – either not yet started, or behind the original timeline. The three items which will take up the groups time for the beginning of next year are:

- EU Strategic Research and Innovation Plan for chemicals in the Green Deal Era (SRIP). This is a stated objective in the CSS and is intended to rethink research and innovation for chemicals and materials, working across sectors and addressing interdependencies of EU strategies. There is a consultation in progress in which Eurometaux is invited to comment on the SRIP by 20 January – to highlight any areas that may be missing with respect to metals and inorganics, and also to point out priorities for R&I that capture sector specificities.
- Safe and Sustainable-by-Design (SSbD) criteria for chemicals and materials. This work is behind its original timeline and the next step is for the Commission to outline its methodology for defining SSbD criteria. This will be done in March 2022 with comments due back by 4 April. The Sustainable Metals Concept and a simple metal “stocks” concept can be used to inform our response to SSbD criteria.
- The REACH Revision and its many supporting studies, each with its own objectives and timeline. A 12-week Open Public Consultation (OPC) on the REACH Revision is expected to start in January 2022, delayed from December 2021. After the OPC the Commission will start drafting its impact assessment for the REACH revision.

The SRIP and criteria for SSbD are the two discussion topics for the next meeting of the HLRT, which is scheduled for May 2022. The group will need to produce draft recommendations on both topics to start the process of preparing the joint report(s) to be discussed at the 3rd HLRT meeting (more information: Simon Cook).

ZERO POLLUTION ACTION PLAN

Green Deal Metals in Europe-Tackling the Zero Pollution Challenge: *a nice event, full of learnings!*

On 7 December, Eurometaux organised a virtual TV-studio high-level debate on mitigating environmental impacts from Europe’s Green Deal metals demand, followed up by a strategic discussion with Eurometaux’s Executive Committee members. The virtual debate kicked off with a presentation from the European Environmental Agency’s Executive Director, Hans Bruyninckx, who gave his views on how to balance the need for significantly more metals for the energy transition with the mitigation of environmental impacts of the “Zero Pollution Ambition”. The opening was followed by a solution-focused debate with Mr Thomas Leysen in his capacity as Umicore Chairman.

Both speakers highlighted that our sector is part of the solution to achieve the EU Green Deal’s goals; both as a crucial enabler of green technologies and as a key actor for a sustainable transition. In a second phase, the Executive Committee’s members discussed how to tackle the Zero Pollution Ambition agenda, which has far-reaching consequences on market and materials resources, financing access and license to operate. The challenge on how to ensure coherence between circularity/climate transition and chemicals management activities (3Cs) was debated as well.

The key learnings were presented to the Chemicals Management Steering Committee and Eurometaux’s Management Committee, who supported the development of a roadmap (more information: Guy Thiran Chris Heron, Laura Fazio Bellacchio, Hugo Waeterschoot and Violaine Verougstraete).

Zero Pollution Stakeholder Platform: *launched!*

On 16 December, the Zero Pollution Stakeholder Platform (ZPSP) gathered (virtually) for the first time. As a reminder, this Platform aims to mainstream across legislation the so-called ‘Zero Pollution Ambition for 2050’, whereby pollution to air, water, and soil, including from industrial facilities, is reduced to levels no longer considered harmful to human health and the environment. Eurometaux was successfully appointed as a member and our Director General Guy Thiran attended the first meeting. This High Level Launch Meeting’ of the Zero Pollution Stakeholder Platform provided the opportunity for the newly appointed members – from industry, civil societies, academia, international organisations, and more – to succinctly outline what their main expectations for this group are. There was overwhelming support for the platform to increase synergies between Green Deal initiatives, such as circular economy and climate policy. During the meeting, we highlighted the obvious tension between increasing production to meet the Green Deal driven demand and the need to reduce emissions of pollutants to achieve our Zero Pollution goals. It is essential that all Green Deal initiatives are managed in a holistic and consistent way, securing Europe’s resilience. We also stressed the need to be pragmatic by focusing on priority impacts and sources in a risk-

based and proportionate manner favouring necessary investments in Europe rather than moving production outside of Europe that would lead to a “pollution leakage”.

The Zero Pollution Stakeholder Platform will meet twice a year. The next meeting is already set for 25 April 2022 (more information: Guy Thiran and Noam El Mrabet).

ZPAP Taskforce Meeting: *Air, Soil and overall strategy*

On 1 December, Eurometaux Secretariat held its Zero Pollution Project Group meeting. Topics on the agenda included the Eurometaux ZPAP Strategy (which was approved by the members), the Open Public Consultation on the revision of the Ambient Air Quality Directives (which was approved and submitted to the Commission), an Air Quality project proposal from ARCHE aimed at obtaining valuable information and scientific evidence to support efficient and effective policy-making on Air Quality, the latest developments on Soil Pollution at political level (with the publication of the EU Soil Strategy) and technical level (with the first meeting of the Commission’s Technical Working Group on Soil Pollution), and discussing the Zero Pollution Stakeholder Platform meeting of 16 December (more information: Violaine Verougstraete, Lorenzo Marotti and Noam El Mrabet)

RISK MANAGEMENT

Risk Management Taskforce Meeting: *increased risk management activity expected in 2022!*

The potential selection of Pb metal as a candidate for the 11th priority list for Authorisation was a key information point at the Risk Management Taskforce session held end of December. ILA presented how they plan for advocacy and contribution to the Public Consultation in case Pb were to be selected; whilst Eurometaux explained what the chances were that Pb metal would be selected and raised generic points in respect to ECHA’s preliminary input for the MSC discussion on the 11th priority list. The Taskforce recognised the importance of the listing of Pb for a long series of users (alloys, recycling, batteries, ..) and agreed to support a combined ILA - Eurometaux information session end of January as soon as it becomes clear that Pb is to be selected, to ensure industry is well informed on how to react to the Public Consultation that will be launched early February.

Eurometaux further informed the Taskforce on the activities on “Grouping for the Assessment of Regulatory Needs (ARN)” announced by ECHA on 7 December (and presented during a webinar on 14 December). ECHA has already been working on grouping for a long period of time but without being able to publish the outcomes or to interact with industry. More transparency will be assured with the publication of the outcomes of the ARN, but ECHA does not intend to allow any specific interaction on the content of the published summary recommendations. They will however consider updates in the registration files. The Taskforce agreed that grouping for risk management is different than for registration, compliance or read-across in that “use and exposure” plays a much more critical role as well as the end-goal of the expected actions (defining the most relevant regulatory need).

Finally the Taskforce took note of the outcomes of the Commission workshop on the future of risk management held on 12 November (see Chemicals Management News of November). Participants continued their brainstorming and review of the pros and cons of the different options proposed, after being reminded of the generic principles the Taskforce had previously agreed to defend (risk-based management action, “focus on what matters”, efficient and effective actions, going for an holistic view on selecting the risk management measure during the RMOa, preventing regrettable substitution or risk management action, fair workload distribution and maintaining an international level playing field for EU industry).

Finally the meeting ended by defining the main expected work packs for the Risk Management Taskforce 2022 agenda as well as suggested meeting dates (see Calendar) (more information: France Capon, Violaine Verougstraete, Klaus Camps and Hugo Waeterschoot).

CLASSIFICATION

Metals Environmental CLH proposals: *Pb, Ag and Cu metal classification proposals all at different stages*

The final RAC opinion on the Pb ENV classification was published end of December. The final opinion was corrected for the M factor mistake but still maintains the recommendation for a single classification entry for Pb metal and powder according to the strictest classification entry (Acute and Chronic; Cat. 1). Eurometaux and ILA will analyse the final opinion early 2022 while a communication briefing workshop to

prepare for the Commission advocacy activity is now scheduled for 12 January. On silver, RAC held extensive discussions at its meeting end of November (see last month's report). Industry analysed the outcome of the discussions concluding that for Ag metal RAC will most probably accept a split classification for the different forms (massive, powder and nanos) but the way the Ecotoxicity Reference Value (ERV) was derived did not follow the ECHA CLP metals guidance.

Finally, in December ECHA published the Cu metal environmental classification proposal developed by KEMI (Sweden). The publication triggered the launch of the Public Consultation on the copper proposal, a consultation that will run until the end of January 2022. The proposal recognises a surface-based split which seems perfectly aligned with the methodology in the ECHA CLP metals guidance section. It is therefore hoped that RAC will not start developing new views as they have done in the past, especially for Pb and to a lesser extent for Ag. In general, it is remarkable to note how 3 comparable metal environmental classification dossiers are handled very differently, despite the guidance and concepts that apply equally to each of the 3 cases. In the follow-up advocacy activity Industry will for sure promote that all metal cases are conducted according to the guidance (more information: Steve Binks, Jelle Mertens, Stijn Baken and Hugo Waeterschoot).

INDUSTRIAL EMISSIONS

Industrial Emissions Alliance: *Article Forum 13 Meeting*

On 17 December 2021 the 16th Meeting of the Industrial Emissions Directive (IED) Article 13 Forum was held. The first topic on the agenda was the Forum opinion on the final draft BAT (Best Available Technique) reference document for the Ferrous Metals Processing Industry (FMP BREF). The main issue for discussion on the FMP BREF (Best available technology Reference document) was the fact that a 'BAT' for using 'fossil free electricity' in heating processes was introduced in the final meeting in a number of BAT conclusions and accepted without further details having been provided in the rest of the BREF. Several stakeholders, including Eurometaux, supported Eurofer's view that BATs should be based on appropriate techno-economic evidence in the BAT candidates sections of the document. The EIPPCB promised to work on a draft section for this BAT in the BREF. After that, the Commission made a presentation on the state of play of the Revision of the IED and E-PRTR (European Pollutants Release and Transfer Register) Regulation. The adoption of both the revisions is planned for early Q2 2022.

For what concerns the content of the review, nothing substantial was presented, except a slight update of the specific objectives.

The EIPPCB presented some slides on their work programme. In 2022, they will finalise the work on the Slaughterhouses and Animal By-products (SA) BREF and kick off the work on the Surface Treatment of Metals and Plastics (STM) and on the Large Volume Inorganic Chemicals (LVIC). The kick-off meeting is planned for Q2 2022. Eurometaux is in the Technical Working Group (TWG) for the BREF reviews.

The EIPPCB also announced that they will tentatively reactivate the TWG for the horizontal BREFs Emissions from Storage (EFS) and Industrial Cooling Systems (ICS) at the end of 2022.

A more detailed update will be circulated to the IE Taskforce (more information: Lorenzo Ceccherini, Lighea Speciale, Lorenzo Marotti and Violaine Verougstraete).

Air Quality: *December updates*

On 1 December, Eurometaux in collaboration with ARCHE sent a scientific abstract to SETAC Copenhagen 2022 (15-19 May 2022) for the session on 'Environmental chemistry and exposure assessment: analysis, monitoring, fate and modelling - air pollution: exposure and effects on human and environmental health'.

The study aims at quantifying the impact of NFM sector stack and fugitive emissions on human exposure and health by quantifying factory emissions' attributable fraction to ground level concentration levels, population attributable exposure fraction and health impact by using the Burden of Disease (BoD) concept accepted by WHO. Overall, the study aims at increasing the understanding of the NFM sector's impact on emissions, to identify the main contributions and suggest the design of actions considering the added value for economy/society in the most cost-effective approach possible, without disproportionate costs for industry.

On 7 December, the EEA published the Europe Air Quality Status 2021 report, stating that: 'air pollution is the single largest environmental health risk in Europe and has significant impacts on the health of the European population, particularly in urban areas. While emissions of key air pollutants and their concentrations in ambient air have fallen significantly over the past two decades in Europe, air quality remains poor in many areas'.

On 16 December, Eurometaux responded to the Open Public Consultation on the Revision of the Ambient Air Quality Directives. The recommendations supporting our response to the OPC discussed and agreed with the ZPAP PG members were attached. Following that, we received an invitation to respond to the Targeted Stakeholder Survey (TSS) on Air Quality (due on 24 January). Currently Eurometaux is drafting the TSS response, which will be shared and discussed with the ZPAP Project Group members.

On 20 December, the Environment Council convened to discuss the Third Clean Air Forum, which took place in Madrid over the course of two days in November. Commissioner Sinkevičius highlighted that 'air quality is linked with other environmental and sociological challenges, and that the EU must work to reduce air pollution at the source, in sectors such as industry, transport and agriculture'.

Eurometaux will publish a position paper on the EU Air Quality Review and continue to engage in the upcoming events (more information: Lorenzo Marotti).

WATER

Review of the Nickel EQS Dossier

The Commission indicated that a review of the Ni Environmental Quality Standards (EQS) was ongoing and invited members of the Working Group chemicals to give their comments on the 2 documents in the Nickel folder on CIRCABC. These 2 documents come from a preliminary review carried out by the Joint Research Centre (JRC) in 2017. This 2017 version of the draft Nickel EQS dossier contains several revisions that would have significant impacts and consequences, i.e., the defined Maximum Accepted Concentration Fresh Water (MAC FW) is less than the Annual Average (AA) FW EQS, meaning that the MAC FW would become the EQS. In 2017, NiPERA and the JRC communicated about these documents and the JRC stated at the time that they were "a starting point". The Commission does not appear to be aware of this, as in the accompanying email they state that the JRC documents in the folder are up to date. NiPERA contacted the Commission to inquire about the scope of the review and were asked to recontact JRC. JRC in follow-up set up a meeting with NiPERA on 10 December, confirming no further work has been done since 2017 as their resources are still focused on the candidates' dossier.

NiPERA/NI submitted comments and Eurometaux submitted a supporting paper to Commission (more information: Lara V.

Publication of the SCHEER final Opinion on the silver EQS draft dossier

The final opinion for silver has been published by the Scientific Committee on Health, Environmental and Emerging Risks (SCHEER): [HERE](#)

Except for some editorial changes, the document is the same as the draft opinion and it appears that our comments were not considered. This seems to be confirmed by a bilateral response from the SCHEER Secretariat to our comments on their draft opinion.

Drinking Water Directive (DWD) update

Klaus Ockenfeld from the Kupferinstitut is following this process closely and has been appointed as an observer for the European Commission DWD Expert Group . ECHA has set up Working Groups on behalf of the Commission (one of which is specifically for metals and is chaired by UBA) to work on a positive list for DWD (in which industry is not allowed to participate).

This process is scheduled to run through until 2032, with a **first draft of the positive list** scheduled for January 2025.

ECHA is in the process of defining methods for the approval of materials (to be on the positive list). There are 70 metallic substances on the current [positive list](#) that will be evaluated under ECHA's new approval scheme. It is foreseen that some metals will be removed from the list, but at the moment the work is still ongoing. We will keep you informed as soon as there is news, and the positive list is established.

(more information: Lara Van de Merckt)

TOOLS

Multi Metallic Database: final data check and creation of the accounts

The month of December was dedicated to the finalisation of the Multi Metallic Database (MMD).

Minor improvements suggested during the testing phase were implemented, and further work was done to improve the functionality to extract and compare data from the ECHA dissemination website. As a result,

besides divergencies between the MMD and ECHA, it is also possible to see clearly for which fields the comparison is conducted.

While data owners are in the checking process of their data following the last data check with ECHA, we are now creating accounts for those that requested access via the [online form](#) circulated at the end of last year (more information: Federica Iaccino, Violaine Verougstraete, Lorenzo Zullo).

COMMUNICATION

Chairmanship: Ms Lisa Allen (ILA) will take over from Dr Steve Binks as Chair of the Regulatory Forum, all the other Chairs confirmed their commitment to their position.

Privileged contacts: Starting in January 2022, twice a year, members of staff from the EM Chemicals Management team will contact “their” EM members to exchange, identify if their needs are addressed and where Eurometaux can be of further help. A list of these privileged contacts is available upon request lee@eurometaux.be

Metals Academy: It is intended to hold a live version of the Metals Academy on 04-06 May 2022. The programme will be updated to include the changes since the initial version was created nearly 2 years ago. For any extra information, registrations: please contact Ailsa lee@eurometaux.be

CALENDAR

Please find here below a non-exhaustive list of the meetings that are planned for 2022.

For meetings at Eurometaux

The MCC has been opened to allow hybrid meetings with sanitary measures put in place (maximum n° of participants and for those having to travel to Brussels, please note that the Belgian authorities are in the process of imposing the COVID-safe ticket (more details on <https://www.info-coronavirus.be/en/>), **but due to an unfortunate rise of Covid cases** in Belgium (and other member countries) for the moment we prefer – **for the safety of all – to hold our meetings online** (links to join will be sent ahead of the meetings).

For meetings at ECHA

ECHA meetings, including those of formal ECHA bodies, will be held remotely until further notice. ECHA will keep the situation under review and will provide any further information as appropriate. This information is published on ECHA’s [website](#)

Further information on the COVID-19 situation information can be found on the [ECDC website](#)

All meetings in “blue” are organised by Eurometaux (with Workshops in collaboration with members)

- 12 January: Lead Environmental Classification Workshop
- 17 January: Copper Classification Workshop
- 18 January: Evaluation Taskforce
- 24 January: CASG-ED (Commission)
- 28 January: EM/ILA Lead Workshop
- 24-28 January: ECHA RAC-60 CLH WG
- 31 January – 01 February: MEED Workshop
- 31 January – 04 February: ECHA RAC-60 AfA WG
- 31 January-1 February: Metals ENV. Exposure Data (MEED)
- 07-11 February: ECHA MSC-77
- 09-10 February: ECHA RAC-60 REST WG
- 21 February: Risk Management Taskforce
- 24 February: Chemicals Management Steering Committee
- 28 February: Metals ENV. Exposure Data (MEED) Webinar Workshop
- 1-2 OR 3 March (TBC): Water Taskforce

- 07-11 March: ECHA RAC-60 Plenary & SEAC-54
- 14-18/19 March: ECHA RAC-60 Plenary (reserve) & SEAC-54
- 21-24 March: [Chemicals Management Spring Week](#)
- 22 March: SSbD Commission Workshop (TBC)
- 24-25 March: ECHA MB
- 19-22 April: ECHA RAC-61 CLH WG
- 25 April: 2nd Zero Pollution Stakeholder Platform
- 25-29 April: ECHA RAC-61 AfA WG
- 04-05 May: ECHA RAC-61 REST WG
- 04-06 May: [Metals Academy \(TBC\)](#)
- 16-19 May: SETAC 32 (Copenhagen)
- 18 May: CSS High-Level Roundtable
- 25 May: [Chemicals Management Steering Committee](#)
- 30 May-03 June: ECHA RAC-61 Plenary (reserve) & SEAC-55
- 6/7-10 June: ECHA RAC-61 Plenary & SEAC-55
- 13-17 June: ECHA MSC-78
- 15-16 June: ECHA MB
- 21 June: [Risk Management Taskforce](#)
- 04-07 July: ECHA RAC-62 CLH + AfA WG
- 18 August: ECHA RAC-62 REST WG
- 1 September: [Chemicals Management Steering Committee](#)
- 05-09 September: ECHA RAC-62 Plenary (reserve) & SEAC-56
- 12-16 September: ECHA RAC-62 Plenary & SEAC-56
- 19-23 September: [Chemicals Management Autumn Week](#)
- 29-30 September: ECHA MB
- 28 September: [Risk Management Taskforce](#)
- 10-14 October: ECHA RAC-63 AfA WG
- 10-14 October: ECHA MSC-79
- 24-28 October: ECHA RAC-63 CLH WG
- 3-4 November: ECHA RAC-63 REST WG
- 28 November – 02 December: ECHA RAC-63 Plenary & SEAC-57
- 05-09 December: ECHA SEAC-57
- 06 December: [Chemicals Management Steering Committee](#)
- 07-09 December: ECHA RAC-63 Plenary (reserve)
- 12-16 December: ECHA MSC-80
- 15-16 December: ECHA MB
- 20 December: [Risk Management Taskforce](#)

GENERAL INFORMATION & ACRONYMS

Follow the logo and check out our new Metals Gateway website.



This website is a one stop information source for regulators & risk assessors dealing with metals/metal compounds and is tailored to the specific needs of the metals industry sector.

A continuously updated list of acronyms is available under the Reach Metals Gateway (RMG)